

**To:** Pearson, Evan[Pearson.Evan@epa.gov]; Flores, Carlos[Flores.Carlos@epa.gov]  
**From:** Bates, Samuel[O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB5C71F0659D41E99173246B1C8EEF95-TATES, SAMUEL]  
**Sent:** Wed 4/3/2019 4:10:19 PM (UTC)  
**Subject:** FW: ITC Tank Farm - FW: SDSs  
[ITC Deer Park tank analysis.xlsx](#)

Samuel Bates, Chief  
Chemical Accident Enforcement Section (6EN-AS)  
Compliance Assurance and Enforcement Division  
[tates.samuel@epa.gov](mailto:tates.samuel@epa.gov)  
(214) 665-2243 voice  
(214) 665-7447 fax

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**From:** Stucky, Marie  
**Sent:** Wednesday, April 03, 2019 11:06 AM  
**To:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>  
**Cc:** Bates, Samuel <[Tates.Samuel@epa.gov](mailto:Tates.Samuel@epa.gov)>; Welton, Patricia <[Welton.Patricia@epa.gov](mailto:Welton.Patricia@epa.gov)>  
**Subject:** FW: ITC Tank Farm - FW: SDSs

This is a tentative analysis on what we know now from Jim Belke at OEM. Craig Haas from OECA is having his contractors look at this issue as well, and we are hoping to have a response from him by COB tomorrow.

Hope this helps!  
Marie Stucky  
EPA Region 6

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**From:** Belke, Jim  
**Sent:** Wednesday, April 3, 2019 10:47 AM  
**To:** Stucky, Marie <[Stucky.Marie@epa.gov](mailto:Stucky.Marie@epa.gov)>  
**Cc:** Haas, Craig <[Haas.Craig@epa.gov](mailto:Haas.Craig@epa.gov)>  
**Subject:** RE: ITC Tank Farm - FW: SDSs

Marie – here is my analysis (attached) based on the information we have so far. The SDSs were helpful in determining that some of the gasoline and naphtha blends are NFPA-3. If accurate, they are not covered.

There are five tanks where there is not enough information to say for sure whether they are covered. SDSs for those tanks would be helpful if we can get them.

Jim Belke

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**From:** Stucky, Marie  
**Sent:** Wednesday, April 03, 2019 10:44 AM  
**To:** Haas, Craig <[Haas.Craig@epa.gov](mailto:Haas.Craig@epa.gov)>; Belke, Jim <[Belke.Jim@epa.gov](mailto:Belke.Jim@epa.gov)>  
**Subject:** RE: ITC Tank Farm - FW: SDSs

At this point, we are looking if they are regulated substances under Part 68. I will likely get the EHS question as a follow-up in the future, but right now we are focused on RMP.

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**From:** Haas, Craig  
**Sent:** Wednesday, April 3, 2019 9:42 AM  
**To:** Stucky, Marie <[Stucky.Marie@epa.gov](mailto:Stucky.Marie@epa.gov)>; Belke, Jim <[Belke.Jim@epa.gov](mailto:Belke.Jim@epa.gov)>  
**Subject:** RE: ITC Tank Farm - FW: SDSs

Are we trying to determine if these are regulated substances under Part 68, or if they are EHSes for the purposes of General Duty?

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**From:** Stucky, Marie

**Sent:** Wednesday, April 03, 2019 10:39  
**To:** Belke, Jim <[Belke.Jim@epa.gov](mailto:Belke.Jim@epa.gov)>; Haas, Craig <[Haas.Craig@epa.gov](mailto:Haas.Craig@epa.gov)>  
**Subject:** FW: ITC Tank Farm - FW: SDSs

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**From:** Smalley, Bryant  
**Sent:** Wednesday, April 3, 2019 9:29 AM  
**To:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>; Stucky, Marie <[Stucky.Marie@epa.gov](mailto:Stucky.Marie@epa.gov)>  
**Subject:** FW: ITC Tank Farm - FW: SDSs

This is what I have.

Bryant

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**From:** Adams, Adam  
**Sent:** Monday, March 18, 2019 1:03 AM  
**To:** Rauscher, Jon <[Rauscher.Jon@epa.gov](mailto:Rauscher.Jon@epa.gov)>; Smalley, Bryant <[smalley.bryant@epa.gov](mailto:smalley.bryant@epa.gov)>  
**Subject:** ITC Tank Farm - FW: SDSs

FYI for reference.

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**From:** Mike Taylor <[mtaylor@iterm.com](mailto:mtaylor@iterm.com)>  
**Sent:** Monday, March 18, 2019 12:53 AM  
**To:** Adams, Adam <[Adams.Adam@epa.gov](mailto:Adams.Adam@epa.gov)>; [spill12@tceq.state.texas.gov](mailto:spill12@tceq.state.texas.gov); [b.latham@WestonSolutions.com](mailto:b.latham@WestonSolutions.com); Mason, Steve <[mason.steve@epa.gov](mailto:mason.steve@epa.gov)>; Daniel Tighe <[Daniel.Tighe@WestonSolutions.com](mailto:Daniel.Tighe@WestonSolutions.com)>  
**Cc:** Mike Taylor <[mtaylor@iterm.com](mailto:mtaylor@iterm.com)>; [harrison.reback@bakerbotts.com](mailto:harrison.reback@bakerbotts.com); [matthew.kuryla@bakerbotts.com](mailto:matthew.kuryla@bakerbotts.com)  
**Subject:** SDSs

Here are the SDSs for tanks 80-2, 80-3, 80-5, 80-6, 80-8, and 80-11. I wrote the corresponding tank numbers at the top.

Mike Taylor  
Environmental Compliance Specialist  
Intercontinental Terminals Company LLC  
281.884.0353  
[mtaylor@iterm.com](mailto:mtaylor@iterm.com)

# ITC Deer Park Fire Storage Tank Analysis

Tank	Product	Components	Boiling Point
80-01	Yubase	lubricants	
80-02	Naphtha/Gasoline blendstock	various, no specific chemicals named	IBP 94.3F, 5% evap BP 1
80-03	Gasoline blendstock	various, no specific chemicals named	IBP 97.4F, 5% evap BP 1
80-04	Yubase	lubricants	
80-05	Mixed xylene	xylenes	138.8F
80-06	Gasoline blendstock	various, inc 14.2% olefins	IBP 84.7F, 10% evap 113
		various, inc .911% C4 and lighter, plus 1.385% 1-pentene, 1.038% isoprene, 1.323% 1,3-pentadiene, etc	
80-07	Pygas	various, inc 7% C4 and 12.7% C5, butane and pentane well over 1%	IBP 10.9F, 10% BP 82.11
80-08	Naphtha/Gasoline blendstock	various, inc 2.27% 1-pentene, 1.59% isoprene, 14% C5s	
80-10	Pygas	base oils	
80-11	SN115	toluene, small amounts of other	110.4F
80-13	Toluene	various, inc 1.12% isoprene, 17.8% C5s	
80-14	Pygas	various, including 8.13% C1-5s	
80-15	Pygas		

Flash Point	NFPA Level?	RMP-covered?
210F	< 4 (FP too high)	No
34.2F	3 (based on MSDS)	No
34.5F	3 (based on MSDS)	No
200F	< 4 (FP too high)	No
	3 (based on MSDS + BP too high)	No
.4F	3 (based on MSDS)	No
F	unknown	unknown
	unknown	unknown
198C	unknown	unknown
	1 (based on MSDS)	No
	< 4 (BP too high)	No
	unknown	unknown
	unknown	unknown

**To:** Thompson, Steve[thompson.steve@epa.gov]  
**Cc:** Bates, Samuel[Tates.Samuel@epa.gov]; Welton, Patricia[Welton.Patricia@epa.gov]  
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**Sent:** Wed 4/3/2019 5:02:35 PM (UTC)  
**Subject:** Updated Table for Chemicals  
[ITC Deer Park tank analysis.xlsx](#)

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**From:** Belke, Jim  
**Sent:** Wednesday, April 3, 2019 11:43 AM  
**To:** Stucky, Marie <Stucky.Marie@epa.gov>  
**Cc:** Haas, Craig <Haas.Craig@epa.gov>  
**Subject:** RE: ITC Tank Farm - FW: SDSs

Updated based on latest SDS for Pygas, which I assume applies to all four tanks containing Pygas. So assuming the SDSs are accurate, the only tank we don't have an answer for is 80-08.

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**Cc:** Mike Taylor <[mtaylor@iterm.com](mailto:mtaylor@iterm.com)>; [harrison.reback@bakerbotts.com](mailto:harrison.reback@bakerbotts.com); [matthew.kuryla@bakerbotts.com](mailto:matthew.kuryla@bakerbotts.com)  
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F	3 (based on MSDS)	No
	unknown	unknown
198C	3 (based on MSDS)	No
	1 (based on MSDS)	No
	< 4 (BP too high)	No
	3 (based on MSDS)	No
	3 (based on MSDS)	No

7,10,14,15 = NFPA 3 base on Pygas MSDS sent 4/3 @12:33 pm



CERTIFIED MAIL – RETURN RECEIPT REQUESTED:

Carl Holley, VP, Safety, Health, and Environmental and Regulatory Compliance  
Intercontinental Terminals Company LLC  
P.O. Box 698  
Deer Park, Texas 77536-0698

Re: 114 Information Request  
Intercontinental Terminals Company LLC, Deer Park, Texas Terminal

Dear Mr. Holley:

Enclosed is an Information Request (Request) issued to Intercontinental Terminals Company LLC (ITC) under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information necessary to determine whether ITC's Deer Park, Texas Terminal is in compliance with provisions of the CAA. The Request contains detailed instructions, specific questions, and other relevant material for your use in responding to the Request.

Please provide the information within thirty (30) days of receipt of this letter to Mr. Daniel Hoyt (6EN-AS) at the above address. If you need additional time, EPA may grant an extension for cause, upon written request.

If you have any questions regarding the Request, please feel free to contact Mr. Hoyt, of my staff, at (214) 665-7326.

Sincerely,

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure

cc: Ashley K. Wadick  
Texas Commission on Environmental Quality, Region 12

Michael De La Cruz  
Texas Commission on Environmental Quality